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FILED
Clerk
District Court

DEC 30 2022

for the Northern Mariana Islands
By — (Deputy Clerk)

7 *Attorneys for the United States of America*

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,

CIVIL CASE NO. **CV 22-00020**

11 Plaintiff,

12 vs.

13 \$271,087.88 IN U.S. CURRENCY SEIZED
FROM BANK OF SAIPAN ACCOUNT NO.
ENDING IN LAST FOUR DIGITS 0157,
HELD IN THE NAME OF "MCS"; and

14 \$39,188.38 IN U.S. CURRENCY SEIZED
FROM BANK OF SAIPAN ACCOUNT NO.
ENDING IN LAST FOUR DIGITS 2098,
HELD IN THE NAME OF "MCS",

17 Defendants.

APPLICATION FOR WARRANT OF
ARREST *IN REM*

18 The United States of America, by and through undersigned counsel, respectfully requests
19 that the Clerk of this Court issue the attached Warrant of Arrest *in Rem* pursuant to Rule G(3)(b)(i)
20 of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims
21 and Asset Forfeiture Actions (attached as Government Exhibit 1). In support of its application,
22 the United States avers as follows:

23 1. On December 30, 2022, the United States filed a Verified Complaint for Forfeiture *in*
24 *Rem* ("Verified Complaint") in the above-entitled case. The Verified Complaint seeks the

forfeiture of the below listed properties:

- a. \$271,087.88 in U.S. currency, which was seized on November 8, 2019, from Bank of Saipan Account No. ending in last four digits 0157, held in the name of “MCS”; and
- b. \$39,188.38 in U.S. currency, which was seized on November 8, 2019, from Bank of Saipan Account No. ending in last four digits 2098, held in the name of “MCS”.

(hereafter collectively referred to as “defendant properties”).

The defendant properties are in the control of the Internal Revenue Service-Criminal Investigation, which obtained such possession, custody and control on the dates stated in the above descriptions of defendant properties, pursuant to a seizure warrant related to the on-going criminal investigation.

2. Supplemental Rule G(3)(b)(i) provides that if a property is subject to forfeiture in a civil forfeiture case, and the property is in the Government's possession, custody or control, the clerk "must issue a warrant to arrest the property."

WHEREFORE, the United States respectfully requests that the Clerk of the Court issue the attached Warrant of Arrest *in Rem*.

RESPECTFULLY SUBMITTED this 30th day of December, 2022.

SHAWN N. ANDERSON
United States Attorney
Districts of Guam and the NMI

By: /s/ Jessica F. Wessling
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